

FILED
At Albuquerque NM

DEC 28 2011 *WQ*

MATTHEW J. DYKMAN
CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,
Plaintiff,

CRIMINAL NO.:

11-3191

v.

LAWRENCE ETSITTY, JR.,
Defendant.

VIOLATIONS: 18 U.S.C. § 242
18 U.S.C. § 1001

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this indictment:

1. The Navajo Police Department is a law enforcement agency that serves the Navajo Reservation.
2. Defendant **Lawrence Etsitty, Jr.** was an officer with the Navajo Police Department, assigned to the Crownpoint District, located in New Mexico.
3. Paragraphs 1 and 2 are hereby incorporated by reference into the counts set forth below.

COUNT I

[18 U.S.C. § 242]

On or about January 25, 2009, in the District of New Mexico, defendant

Lawrence Etsitty, Jr.,

while acting under color of law, willfully deprived K.B. of the right, protected and secured by the Constitution and laws of the United States, not to be subjected to unreasonable seizure by a law enforcement officer. Specifically, the defendant groped, touched, and kissed K.B. against her will while K.B. was handcuffed. This offense included kidnapping.

All in violation of 18 U.S.C. § 242.

COUNT II

[18 U.S.C. §1001]

On or about January 27, 2009, in the District of New Mexico, defendant

Lawrence Etsitty, Jr.,

knowingly and willfully made false, fictitious, and fraudulent statements to a Special Agent of the Federal Bureau of Investigation (FBI) concerning facts material to a matter being investigated by the FBI, an agency of the United States. Specifically, defendant **Lawrence Etsitty, Jr.** stated that he did not grope and touch K.B. inappropriately while she was in his custody. This statement was false in that defendant **Lawrence Etsitty, Jr.** knew at the time of his statement to the FBI that he had, in fact, groped, touched, and kissed K.B. against her will while K.B. was in his custody.

All in violation of 18 U.S.C. § 1001.

A TRUE BILL


/s/

FOREPERSON

APPROVED:

THOMAS E. PEREZ
ASSISTANT ATTORNEY GENERAL
CIVIL RIGHTS DIVISION
UNITED STATES DEPARTMENT OF JUSTICE

BY:



FARA GOLD
TRIAL ATTORNEY
CRIMINAL SECTION
CIVIL RIGHTS DIVISION
UNITED STATES DEPARTMENT OF JUSTICE